

ATTACHMENT 19a

BellSouth / Competitive Local Provider Service Order Edits are Discriminatory

BellSouth has not Provided Business Rules, Edit Information or Codes Which are Necessary for CLPs to be able to Pre-Edit Their Own Orders

System Used and User	SONGS BellSouth	RNS BellSouth	EDI - Mainframe CLP	EDI - Personal Computer CLP	LENS CLP	EXACT CLP
Edits Applied by BellSouth						
On-Line						
FUEL		X				
SOLAR		X				
SOER	X					
After Order Submission						
SOER		X	X	X	X	X
LEO			X	X	X	
LESOG			X	X	X	
CLP Pre-Edit			X (1)			

(1) A CLP can build a pre-editor to match BellSouth only if BellSouth provides the business rules, edit information and codes being used in the systems handling the CLP's orders. BellSouth has not made this information available.

FUEL = FID and USOC Edit Library

SOLAR = Service Order Layout and Analysis Routine

SOER = Service Order Edit Routine

LEO = Local Exchange Ordering

LESOG = Local Exchange Service Order Generator

ATTACHMENT 20



BellSouth Telecommunications, Inc.
Suite 4423
675 West Peachtree Street, N.E.
Atlanta, Georgia 30375

404 927-7140
Fax 404 523-0346

Joseph M. Baker
Vice President - Sales
Interconnection Services

September 2, 1997

Re: Due Dates on LENS Resale Orders

Dear CLEC Customers:

Recently you were provided a table of due date intervals for use in determining due dates for resale orders. For services requiring a premises visit, this information is used in conjunction with the installation calendar available through the inquiry mode of LENS to determine available installation dates that can be offered to customers.

In addition to providing the installation calendar, LENS provides an alternative due date function in the firm order mode. For some types of orders issued through LENS, BellSouth currently is re-evaluating that alternative due date function. CLECs issuing LENS orders for conversions "as specified" and new installations should be aware that the LENS firm order due date function may not always be calculating the correct due date for those order types for some locations. The installation calendar available through the LENS inquiry mode and the firm order due date function for conversion "as is" orders issued through LENS are not affected. Also, orders issued through the industry-recommended Electronic Data Interchange (EDI) ordering interface are not affected.

We will notify you promptly of the results of our evaluation. Meanwhile, if you are placing orders through LENS for conversions "as specified" or for new installations, and the LENS order disagrees with the due date table, please submit the LENS order with the calculated due date, then contact the Local Carrier Service Center (LCSC) for assistance. If you are placing orders through the industry-recommended Electronic Data Interchange (EDI) ordering interface, or are issuing orders for conversion "as is" through LENS, please continue to establish due dates as usual.

Please contact your account manager if you have any questions.

Sincerely,



J. M. Baker

ATTACHMENT 21

Overview of LENS Pre-Order Functionality

Inquiry Mode Functionality Consists of Five Independent Transactions Without Memory Between the Transactions.

Because There is no Memory Between the Transactions, three of the Transactions, Telephone Number Selection, Services and Features Available, and View Installation Calendar Require the Performance of an Address Validation as part of Their Operation.

1. Customer Service Record (CSR)
2. Address Validation (AV)
3. Telephone Number Selection (AV + TNS) (Restricted by the 100 Number / 5% Rule)
4. Services and Features Available (AV + S&F) (Information on Complex Services is Not Provided)
5. View Installation Calendar (AV + VIC) (No Intervals for UNEs, Complex Services, or Central Office Only Orders) (Due Date is an Estimate)

The Transactions can be Performed in Any Sequence.

Firm Order Mode Functionality Consists of Six Linked and Dependent Transactions With Memory Between Them.

The Transactions Must be Performed in the Required Sequence As If Preparing An Actual Order.

Therefore this Mode Can Only Be Used For The Types of Orders and Services Supported by LENS, Not for the Full Range of Order Types and Services a CLP Can Actually Order for Its Customers.

1. Customer Service Record (CSR)
2. Address Validation (AV)
3. Telephone Number Selection (TNS) (Not Restricted by the 100 Number / 5% Rule) (Reservations Only "stick" if a LENS Order is Placed.)
4. Services and Features Available (S&F) (Only Services Which Can Be Ordered Through LENS Are Shown)
5. Local Service Request (LSR) (This Transaction is Required to Place a LENS Order But Has Nothing To Do With the Pre-Order Process - The Requirements of Approximately a Dozen Screens Must be Satisfied)
6. Due Date Calculation (DD) (Works Only For the Types of Orders and Services Which Can Be Ordered in LENS)

Neither Mode Standing on Its Own, Nor the Combined Use of the Modes Provides a CLP With the Pre-Ordering Functionality Available to BellSouth

ATTACHMENT 22



Pamela A. Nelson

Room 12W54
Promenade II
1200 Peachtree St., NE
Atlanta, GA 30309
404 810-3100

June 11, 1997

Mr. Jerry Hendrix
BellSouth Interconnection Services
675 W. Peachtree Street
Atlanta, Georgia 30375

Dear Jerry,

I received your memo of May 21, regarding due date and appointment scheduling for AT&T. It is AT&T's position that BellSouth's response forces AT&T to develop a process inferior to that which BellSouth employs for itself for due date assignment and appointment scheduling, and as such does not meet the parity requirements of the Telecommunications Act of 1996 and our Interconnection Agreement.

BellSouth currently has the ability to provide to the end user with a due date which is calculated based on the service address, facilities available and particular features and services requested. Once the due date is calculated, BellSouth has the ability to reserve an installation appointment for the customer. AT&T has asked BellSouth to provide that same capability through the long term interface. BellSouth has offered only the ability to estimate a due date based on a dynamic installation calendar and a standard interval guide. BellSouth's proposal contains no provision to allow reservation of customer appointments.

It appears that BellSouth has the capability to meet AT&T's requirements. Per BellSouth's LENS documentation, users who input service orders directly into LENS are given a due date that is calculated by BellSouth and these users have the ability to schedule premise appointments for that service order. The due date calculation and appointment scheduling function are performed prior to the submission of the Local Service Request. Based on our knowledge of the LENS functionality, it is difficult to understand your assertion that the functionality to schedule an appointment and reserve a due date in a pre-order mode does not exist within BellSouth. The due date and appointment scheduling functionality I have described above is the exact functionality that AT&T desires that BellSouth provide in the long term gateway. If BellSouth can provide this functionality in LENS, BellSouth should be able to provide it in the long term application.

Our implementation schedule for the development of the pre-ordering application can not tolerate further delay in closing on requirements that are to part of this development for year end 1997. To this end, AT&T proposes that we develop the limited capability that BellSouth has proposed as the initial step to be complete by the introduction of the pre-ordering interface at year end 1997. This initial functionality will include the ability to view a dynamic installation calendar and a work interval guide. This is the functionality described as the Inquiry function in the LENS documentation.

As we are implementing the initial functionality described above, AT&T and BellSouth must continue to negotiate the requirements that will modify the due date and appointment scheduling function to provide parity in accordance with AT&T's requirements, presented and agreed to in the version 3 specification document. Agreement on the modifications must be reached no later than August 5, 1997 for scheduling parity to be in place not later than early 1Q98.

Please provide your response by June 13, 1997.

Sincerely,



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RECEIVED JUL 1 1997

BELL SOUTHERN

BellSouth Telecommunications, Inc. 404 927-7100
Room 34591 BellSouth Center
675 West Peachtree Street, N.E.
Atlanta, Georgia 30375

June 24, 1997

Ms. Pam Nelson
Room 12W54
Promenade II
1200 Peachtree Street, NE
Atlanta, GA 30309

Dear Ms. Nelson:

This letter is in response to your letter to Jerry Hendrix, dated June 11, and received June 18.

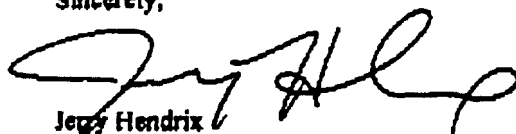
As stated in Jerry's memo of May 21, 1997, BellSouth does not have the functionality of scheduling an appointment and reserving a due date on a pre-order *inquiry*. They do however, have access to the installation and maintenance and central work force calendar needed to approximate a due date.

As you stated in your letter, "BellSouth has the ability to provide to the end-user a due date which is calculated based on the service address, facilities available and particular features and service *requested*." You go on to state that once a due date is calculated, BellSouth has the ability to reserve an installation appointment.

The key word in your statement is "*Requested*." When the BellSouth service representative actually *requests* those services, the due date and appointment scheduling are available. If, however, the representative is in the *inquiry* mode, the representative is limited to a central work force calendar that allows them to approximate a due date. If that due date, and the overall feature/service offering meets the customer needs, the representative can *request*, or place the order, and schedule an appointment and reserve a due date. This same functionality will be available to the CLECs.

I hope this clears up your confusion.

Sincerely,



Jerry Hendrix

cc: Linda Tate
Bob Siegel

ATTACHMENT 23



Pamela A. Nelson

Room 12W54
Promenade II
1200 Peachtree St., NE
Atlanta, GA 30309
404 810-3100

August 21, 1997

Ms. Janice Burmiss
BellSouth
Suite 410
1960 W. Exchange Place
Tucker, GA 30084

Dear Jan:

This letter confirms our discussion yesterday regarding BellSouth's obligations to implement electronic reject capability.

Our Georgia interconnection agreement requires BellSouth to provide AT&T with the electronic capability to receive service order rejects by no later than March 31, 1997. BellSouth has failed to meet that date and subsequent commitments to provide such capability by April 21, 1997, July 31, 1997, and then September 8, 1997.

Marcia Moss of BellSouth now states without explanation that BellSouth will not be providing such capability until November, eight months from that negotiated date set forth in our interconnection agreement.

Such delay can no longer be tolerated. Until this electronic capability exists, AT&T must obtain this information by facsimile. BellSouth's failure to implement an on-line capability for rejected orders is seriously impacting AT&T's ability to provide service at parity with BellSouth to its customers in Georgia and constitutes a continuing barrier to AT&T's market entry in Georgia.

AT&T expects BellSouth to meet the September 8, 1997, date for implementation of the electronic reject capability. Please reaffirm by no later than Monday, August 25, 1997 that the electronic reject capability will be in place by the September 8, 1997, date. Please note that our agreement to accept the September date should not be construed as a waiver of our rights under the interconnection agreement.

Sincerely,



Recycled Paper

ATTACHMENT 24

CLARIFICATION FORM

DATE/TIME 9-23-97 1313 CLEC AT&T
 CLEC CONTACT Joanna Cnsc FAX # 916 431-0603
 PON DDO25115349-0001 LON _____
 VERSION _____ BST REP DPorti TEL # 1-800-472-3116

REASON FOR CLARIFICATION

House Number _____ Street Name _____ Loc ☒ State _____ Zip _____

Class of Service _____ End User Name _____ ACT Code _____ IMPCON _____

BAN _____

BAN _____ ACTL _____ CFA _____ NC _____ NCI _____ SEC NCI _____

Listing _____ New Main Tel # _____ Not A Working Tel # _____ Incorrect Tel # _____

Tel # Not For This End-User _____ DD In Jeopardy _____

USOC(S) IN ERROR _____

REMARKS/OTHER _____

SUPPLEMENTAL LSR REQUIRED? (Y/N) Y

PLEASE RESPOND BEFORE (DATE) 10-23

© BELL SOUTH

CLARIFICATION FORM

DATE/TIME 9-25 1049 CLEC AT+T
CLEC CONTACT _____ FAX # 916-431-0603
PON ND0844 00230-0001
LON _____ VERSION _____

REASON FOR CLARIFICATION

House Number _____ Street Name _____ Loc _____ State _____ Zip _____

Class of Service _____ End User Name X ACT Code _____ IMPCON _____

BAN _____

BAN _____ ACTL _____ CFA _____ NC _____ NCI _____ SEC NCI _____

Listing _____ New Main Tel # _____ Not A Working Tel # _____ Incorrect Tel # _____

Tel # Not For This End-User _____ DD In Jeopardy _____

USOC(S) IN ERROR _____

REMARKS/OTHER _____

SUPPLEMENTAL LSR REQUIRED? (Y/N) Y

PLEASE RESPOND BEFORE (DATE) 10-25

© BELL SOUTH

CLARIFICATION FORM

DATE/TIME 9-25-97 07:35 CLEC AT&T
CLEC CONTACT _____ FAX# (916) 431-0603
PON ND054979080-0001
LON 133870 VERSION 0

REASON FOR CLARIFICATION

House Number _____ Street Name _____ Loc _____ State _____ Zip _____

Class of Service _____ End User Name _____ ACT Code _____ IMPCON _____

BAN _____

BAN _____ ACTL _____ CFA _____ NC _____ NCI _____ SEC NCI _____

Listing ☒ New Main Tel # _____ Not A Working Tel # _____ Incorrect Tel # _____

Tel # Not For This End-User _____ DD In Jeopardy _____

USOC(S) IN ERROR _____

REMARKS/OTHER FORMAT INCORRECTSUPPLEMENTAL LSR REQUIRED? (Y/N) YPLEASE RESPOND BEFORE (DATE) 10-25-97

CLARIFICATION FORM

DATE/TIME 9-23-97 CLEC AT+T
CLEC CONTACT CNSC FAX # 916-431-0103
PON 0037995583 ⁰⁰⁰¹ VERSION 2
EST REP _____ TEL # 1-800-667-8807

REASON FOR CLARIFICATION

House Number _____ Street Name _____ Loc _____ State _____ Zip _____

Class of Service _____ End User Name _____ ACT Code _____ IMPCON _____

BAN _____

BAN _____ ACTL _____ CFA _____ NC _____ NCI _____ SEC NCI _____

Listing _____ New Main Tel # _____ Not A Working Tel # _____ Incorrect Tel # _____

Tel # Not For This End-User _____ DD In Jeopardy _____

USOC(S) IN ERROR _____

REMARKS/OTHER Invalid action code

SUPPLEMENTAL LSR REQUIRED? (Y/N) Y

PLEASE RESPOND BEFORE (DATE) 10-23-97

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CLARIFICATION FORM

DATE/TIME 09-23-97 11:20p CLEC AT&T
CLEC CONTACT _____ FAX # 916-431-0603
PON N0016602276-0001
LON 114978 VERSION 5

REASON FOR CLARIFICATION

House Number _____ Street Name _____ Loc _____ State _____ Zip _____

Class of Service _____ End User Name _____ ACT Code _____ IMPCON _____

BAN _____

BAN _____ ACTL _____ CFA _____ NC _____ NCI _____ SEC NCI _____

Listing _____ New Main Tel # _____ Not A Working Tel # _____ Incorrect Tel # _____

Tel # Not For This End-User _____ DD In Jeopardy _____

USOC(S) IN ERROR _____

REMARKS/OTHER INVALID LISTING FORMAT

SUPPLEMENTAL LSR REQUIRED? (Y/N) _____

PLEASE RESPOND BEFORE (DATE) _____

BELL SOUTH

CLARIFICATION FORM

DATE/TIME 9/23/78 CLEC AT+T
 CLEC CONTACT _____ FAX # 916-431-0603
 PON C0019852294-0001
 LON 132387 VERSION 2 TEL # 1-800-472-3116

REASON FOR CLARIFICATION

House Number _____ Street Name _____ Loc _____ State _____ Zip _____

Class of Service _____ End User Name X ACT Code _____ IMPCON _____

BAN _____

BAN _____ ACTL _____ CFA _____ NC _____ NCI _____ SEC NCI _____

Listing _____ New Main Tel # _____ Not A Working Tel # _____ Incorrect Tel # _____

Tel # Not For This End-User _____ DD In Jeopardy _____

USOC(S) IN ERROR Lname format incorrect

REMARKS/OTHER _____

SUPPLEMENTAL LSR REQUIRED? (Y/N) Y

PLEASE RESPOND BEFORE (DATE) 10-20

131968

CLARIFICATION FORM

DATE/TIME 9/23 1449 CLEC AT-7
 CLEC CONTACT _____ FAX # 916 431-0603
 PON N0025115349-0001 VERSION _____
 BST REP Patty Holcombe TEL # 1-800-667-0807

REASON FOR CLARIFICATION

House Number _____ Street Name _____ Loc X State _____ Zip _____

Class of Service _____ End User Name _____ ACT Code _____ IMPCON _____

BAN _____

BAN _____ ACTL _____ CFA _____ NC _____ NCI _____ SEC NCI _____

Listing _____ New Main Tel # _____ Not A Working Tel # _____ Incorrect Tel # _____

Tel # Not For This End-User _____ DD In Jeopardy _____

USOC(S) IN ERROR _____

REMARKS/OTHER Address does not meet Loc
Standard -

SUPPLEMENTAL LSR REQUIRED? (Y/N) Y

PLEASE RESPOND BEFORE (DATE) 10-23-97

CLARIFICATION FORM

DATE/TIME 9/24/97 13:55 CLEC ATT
 CLEC CONTACT CNSC FAX # 9164310603
 PON N0003872230-0001 LON 133225
 VERSION _____ EST REP RUTHY TEL # 1-800-372-3116

REASON FOR CLARIFICATION

House Number _____ Street Name _____ Loc _____ State _____ Zip _____

Class of Service _____ End User Name _____ ACT Code _____ EMPCON _____

BAN _____

BAN _____ ACTL _____ CFA _____ NC _____ NCI _____ SEC NCI _____

Listing ☒ New Main Tel # _____ Not A Working Tel # _____ Incorrect Tel # _____

Tel # Not For This End-User _____ DD In Jeopardy _____

USOC(S) IN ERROR _____

REMARKS/OTHER LISTED NAME AND LISTED
ADDR FORMAT INCORRECT

SUPPLEMENTAL LSR REQUIRED ☒ _____

PLEASE RESPOND BEFORE (DATE) 10-07-97

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CLARIFICATION FORM

DATE/TIME 9-25 1044 CLEC AT-T
CLEC CONTACT _____ FAX# 916 431-0603
PON N0069259923-0001
LON 134058 VERSION _____

REASON FOR CLARIFICATION

House Number X Street Name X Loc X State X Zip X

Class of Service _____ End User Name X ACT Code _____ IMPCON _____

BAN _____

BAN _____ ACTL _____ CFA _____ NC _____ NCI _____ SEC NCI _____

Listing _____ New Main Tel # _____ Not A Working Tel # _____ Incorrect Tel # _____

Tel # Not For This End-User _____ DD In Jeopardy _____

USOC(S) IN ERROR _____

REMARKS/OTHER _____

SUPPLEMENTAL LSR REQUIRED? (Y/N) X

PLEASE RESPOND BEFORE (DATE) 10-25

CLARIFICATION FORM

DATE/TIME 9-25-97 CLEC AT&T
 CLEC CONTACT CNSC FAX # 914-431-0008
 PON A97108 TULSA 03283
 LON _____ VERSION _____

REASON FOR CLARIFICATION

House Number _____ Street Name _____ Loc _____ State _____ Zip _____

Class of Service _____ End User Name _____ ACT Code _____ IMPCON _____

BAN _____

BAN _____ ACTL _____ CFA _____ NC _____ NCI _____ SEC NCI _____

Listing _____ New Main Tel # _____ Not A Working Tel # _____ Incorrect Tel # _____

Tel # Not For This End-User _____ DD In Jeopardy _____

USOC(S) IN ERROR _____

REMARKS/OTHER Address not valid.

SUPPLEMENTAL LSR REQUIRED? (Y/N) V

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CLARIFICATION FORM

DATE/TIME 09-26-97 4:41a CLEC AT+T
CLEC CONTACT _____ FAX # 916-431-0603
PON: N0030072:784-0001
LON 135280 VERSION _____

REASON FOR CLARIFICATION

House Number _____ Street Name _____ Loc _____ State _____ Zip _____

Class of Service _____ End User Name _____ ACT Code _____ IMPCON _____

BAN _____

BAN _____ ACTL _____ CFA _____ NC _____ NCI _____ SEC NCI _____

Listing _____ New Main Tel # _____ Not A Working Tel # _____ Incorrect Tel # _____

Tel # Not For This End-User _____ DD In Jeopardy _____

USOC(S) IN ERROR _____

REMARKS/OTHER INVALID LISTING FORMAT,CALLER ID DELUXE USOC INVALID

SUPPLEMENTAL LSR REQUIRED? (Y/N) _____

PLEASE RESPOND BEFORE (DATE) _____

CLARIFICATION FORM

DATE/TIME 9.23-97 9:41 CLEC AT&T
CLEC CONTACT CNSC FAX # 916.431.0603
PON N0048023026 0001 LON _____
VERSION 13382 BST REP Walter T TEL # 1-800-872-3116

REASON FOR CLARIFICATION

House Number _____ Street Name _____ Loc _____ State _____ Zip _____

Class of Service _____ End User Name _____ ACT Code _____ IMPCON _____

BAN _____

BAN _____ ACTL _____ CFA _____ NC _____ NCI _____ SEC NCI _____

Listing _____ New Main Tel # _____ Not A Working Tel # _____ Incorrect Tel # _____

Tel # Not For This End-User _____ DD In Jeopardy _____

USOC(S) IN ERROR

NXM

REMARKS/OTHER

NXM INVALID USOC

SUPPLEMENTAL LSR REQUIRED? (Y/N) _____

PLEASE RESPOND BEFORE (DATE) _____

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CLARIFICATION FORM

DATE/TIME 9.27.97 21:10 CLEC ATC T
 CLEC CONTACT CN SC FAX # 916.431.0603
 PON N0075505750-0001
 LON 137449 VERSION _____

REASON FOR CLARIFICATION

House Number _____ Street Name _____ Loc _____ State _____ Zip _____

Class of Service _____ End User Name _____ ACT Code _____ IMPCON _____

BAN _____

BAN _____ ACTL _____ CFA _____ NC _____ NCI _____ SEC NCI _____

Listing _____ New Main Tel # _____ Not A Working Tel # _____ Incorrect Tel # _____

Tel # Not For This End-User _____ DD In Jeopardy _____

USOC(S) IN ERROR

NXM

REMARKS/OTHER

NXM Invalid Usoc

SUPPLEMENTAL LSR REQUIRED? (Y/N) _____

PLEASE RESPOND BEFORE (DATE) _____